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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:	§	Chapter 11
	§	
TEXAS RANGERS BASEBALL PARTNERS,	§	Case No. 10-43400-DML
	§	
<u>Debtor.</u>	§	
	§	
RTKL ASSOCIATES, INC. and	§	
VRATSINAS CONSTRUCTION COMPANY,	§	
	§	
Plaintiffs,	§	
v.	§	Adversary No. 10-4263
	§	(Removed Action)
TEXAS RANGERS BASEBALL PARTNERS,	§	
HSG PARTNERSHIP HOLDINGS LLC,	§	
HICKS HOLDINGS LLC, HICKS GLORYPARK,	§	
LLC, SEG OF OHIO, INC. D/B/A STEINER +	§	
ASSOCIATES, INC., BALLPARK REAL	§	
ESTATE LP, SSR GP INTERESTS, LP, SWS	§	
REALTY, LLC, ARLINGTON INTERESTS, LP,	§	
ARLINGTON DEVCO, LLC, SOUTHWEST	§	
SPORTS REALTY PARTNERS, LP, TEXAS	§	
RANGERS BASEBALL PARTNERS IN ITS	§	
CAPACITY AS POST-EFFECTIVE DATE	§	
DEBTOR UNDER THE CONFIRMED FOURTH	§	
AMENDED PLAN OF REORGANIZATION BY	§	
AND THROUGH ITS PLAN ADMINISTRATOR,	§	
RANGERS BASEBALL EXPRESS LLC, and	§	
RANGERS BASEBALL, LLC,	§	
	§	
<u>Defendants.</u>	§	

TEXAS RANGERS BASEBALL PARTNERS' RESPONSE TO NOTICE OF REMOVAL UNDER FEDERAL RULE OF BANKRUPTCY PROCEDURE 9027(e)(3)

TO THE HONORABLE D. MICHAEL LYNN, U.S. BANKRUPTCY JUDGE:

Texas Rangers Baseball Partners (“TRBP”), in all capacities in which it has been named as a defendant in this action,¹ hereby files its *Response to Notice of Removal Under Federal Rule of Bankruptcy Procedure 9027(e)(3)*, and pursuant to Federal Rule of Bankruptcy Procedure 9027(e)(3) states as follows:

1. On November 4, 2010, defendant Rangers Baseball Express LLC initiated this Adversary Proceeding by filing its Notice of Removal [Docket No. 1], thereby removing to this Court the case previously pending before the Texas District Court, 14th Judicial District, Dallas County, Texas, under Cause No. 10-01163-A.

2. TRBP admits that this proceeding constitutes a “core” proceeding pursuant to 28 U.S.C. § 157(b)(2).

¹ Plaintiffs RTKL Associates, Inc. and Vratsinas Construction Company (“Plaintiffs”) initiated this litigation against TRBP and certain other defendants prior to the filing of TRBP bankruptcy case with this Court, Case No. 10-43400-DML (the “Bankruptcy Case”), on May 24, 2010. Following the Effective Date of TRBP’s confirmed Fourth Amended Plan of Reorganization in the Bankruptcy Case (“Plan”), the Plaintiffs named TRBP as an additional defendant in its purported new capacity as the Post-Effective Date Debtor under the Plan (by and through its Plan Administrator). TRBP is hereby responding to the Notice of Removal in all capacities in which Plaintiffs have named it as a defendant in this action, reserving, however, all rights, defenses, claims and causes of action that it may hold against the Plaintiffs on account of their actions in naming, issuing citation to, and causing TRBP to incur expense in defending and otherwise responding to the claims asserted by Plaintiffs in the multiple purported capacities in which TRBP has been sued.

Dated: November 18, 2010

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By: /s/ Phil C. Appenzeller, Jr.

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CERTIFICATE OF SERVICE

This is to certify that on the 18th day of November, 2010, the foregoing pleading was served by U.S. first class mail, postage prepaid, on each of the following counsel of record in this action:

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